

Application No. 10/677,292
Response to Office Action

Patent
Attorney docket No. 86654-4
(formerly 86177-79)

REMARKS

A. SUMMARY OF THE AMENDMENTS

Claims 1, 18 and 26 have been cancelled.

Claim 2 has been rewritten to include the limitations of claim 1.

Claim 3 has been amended for clarification.

Claims 19, 23, 24 and 25 have been rewritten to include the limitations of claim 18.

Claims 20-22 have been amended to change the claim dependency.

It is respectfully submitted that no new matter has been added by way of the present amendment.

B. ALLOWABLE SUBJECT MATTER

On page 3 of the Office Action, the Examiner has indicated that claims 19, 23, 24, 25 would be allowable if rewritten to include all of the limitations of the base claim (i.e., claim 18) and any intervening claims (of which there are none). In response, this is exactly what the applicant has done and hence it is respectfully submitted that claims 19, 23, 24 and 25 are in allowable form.

In addition, the Examiner has indicated that claims 3-17 would be allowable if rewritten to overcome the rejections under 35 U.S.C. 112, second paragraph, and to include all of the limitations of the base claim and any intervening claims. In response, the Applicant has chosen not to rewrite

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claims 3-17 in the suggested form since, as argued below, claim 2 is considered by the applicant to be allowable, hence not necessitating an amendment to claims 3-17.

C. RESPONSE TO CLAIM REJECTIONS UNDER 35 U.S.C. 112

On page 2 of the Office Action, the Examiner has rejected claims 1-17 under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which the applicant regards as the invention.

In amended claim 1, the expression "at a" has been changed to "at step a)". It is respectfully submitted that it is perfectly clear as to where (i.e., at which step) the cooling requirements are being assessed. Similarly, in claim 3, the expression "at a" has been changed to "at step c)". It is respectfully submitted that it is perfectly clear as to where (i.e., at which step) the amount of cooling is computed.

D. RESPONSE TO CLAIM REJECTIONS UNDER 35 U.S.C. 102

On page 2 of the Office Action, the Examiner has rejected claims 1, 2, 18, 20-22 and 26 under 35 U.S.C. 102(b) as being anticipated by Cray *et al.* U.S. patent 5,131,233 (hereinafter referred to as Cray). In view of the cancellation of claims 1, 18 and 26, it is respectfully submitted that the Examiner's rejection of these claims is moot.

Now, regarding claim 2, this claim has been rewritten to include all of the limitations of its former base claim (i.e., claim 1). It is respectfully submitted that claim 2 is not anticipated by Cray. Specifically, the applicant

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respectfully draws the Examiner's attention to the limitation in claim 2 of the micro-electronic complex being "formed on a unitary body of semiconductor material".

The applicant finds no reference in Cray of independently cooling a plurality of discrete functional modules formed on a unitary body of semiconductor material. Each of Cray's independent cooling systems 20 is enclosed in a separate housing 23, and each such housing contains multiple logic modules containing multiple PCBs containing multiple chips (bodies of semiconductor material). Thus, while Cray may teach *independent systems that each cool multiple bodies* of semiconductor material, there is no teaching or suggestion in Cray of *independently cooling multiple functional modules on a unitary body* of semiconductor material.

Thus, since at least one limitation of claim 2 is not present in the cited art, it is respectfully submitted that the rejection under 35 U.S.C. 102(b) does not hold and the Examiner is therefore respectfully requested to withdraw his rejection of claim 2.

Regarding claims 20-22, each of these claims has been amended to be dependent on an allowable claim (namely, claim 19 rewritten as per the Examiner's suggestion to include the limitations of claim 18). Hence, each of claims 20-22 is also allowable and therefore the Examiner is respectfully requested to withdraw his rejection of claims 20-22.

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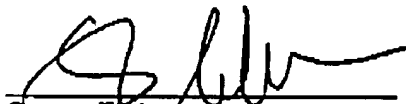
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CONCLUSION

In view of the foregoing, the applicant believes that claims 2-17 and 19-25 are in allowable form. Favourable reconsideration is requested. Early allowance of the Application is earnestly solicited.

If the application is not considered to be in full condition for allowance, for any reason, the Applicant respectfully requests the constructive assistance and suggestions of the Examiner in drafting one or more acceptable claims pursuant to MPEP 707.07(j) or in making constructive suggestions pursuant to MPEP 706.03 so that the application can be placed in allowable condition as soon as possible and without the need for further proceedings.

Respectfully submitted,
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Date: March 7, 2005

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